

# **EXHIBIT A**

# Memorandum



U.S. Department of Transportation  
**National Highway Traffic Safety  
Administration**



**Subject:** Continuation of ARC Investigation

**Date:** December 13, 2024

**To:** Docket No. NHTSA-2023-0038;  
Initial Decision That Certain Frontal Driver  
and Passenger Air Bag Inflators  
Manufactured by ARC Automotive Inc. and  
Delphi Automotive Systems LLC Contain a  
Safety Defect

On July 31, 2024, NHTSA issued a Supplemental Initial Decision that certain frontal driver and passenger air bag inflators manufactured by ARC Automotive Inc. (“ARC”) and Delphi Automotive Systems LLC, and vehicles in which those inflators were installed, contain a safety defect. After consideration of comments, NHTSA is conducting additional investigation of the issues related to the Supplemental Initial Decision. Specifically, commenters raised technical and engineering differences between the inflators as incorporated into the manufacturers’ respective vehicles, along with process differences between the relevant plants and manufacturing lines. Given the potential relevance of these issues to the agency’s decision making, including the appropriate scope of any recall, further investigation is warranted.

To facilitate NHTSA’s understanding and consideration of the comments received, NHTSA intends to issue in the coming weeks additional Information Request letters to ARC, to the manufacturers of vehicles in which the ARC inflators were installed, and to several Tier 1 air bag module suppliers. The questions directed to ARC will include requests for more detail regarding ARC’s inflator production process in each of ARC’s manufacturing plants, including its use of friction welding and borescope inspections. Further, ARC will be asked to provide more detail regarding design and specification differences between driver and passenger inflators. The questions directed to the vehicle manufacturers will include requests for more detail regarding air bag inflator and module specifications differences and whether or how those differences may impact susceptibility of failure. The questions directed to the Tier 1 suppliers will include requests for information related to their air bag inflator suppliers’ use of friction welding and the specification development process for air bag inflators and air bag modules.

NHTSA will evaluate the responses to these Information Requests along with all available information to determine how to proceed. If appropriate, NHTSA will provide a further opportunity for public comment prior to considering whether to issue a final decision in this matter, in accordance with the legal process for a recall order.

Copies of the Information Requests and public versions of the responses, when available, will be posted in the public investigation file for EA16003 (available at <https://www.nhtsa.gov/recalls?nhtsaId=EA16003>).